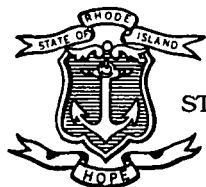


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**3-27-92**



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DIVISION OF AIR AND HAZARDOUS MATERIALS

291 Promenade Street

Providence, R.I. 02908-5767

16 March 1992

Mr. Franco A. LaGreca  
Remedial Project Manager  
NORTHNAVFACENGCOM  
Building 77L, U.S. Naval Base  
Philadelphia, PA 19112-5094

RE: Tanks 53 and 56, Tank Farm 5, NETC, Newport RI

Dear Mr. LaGreca:

The Department has reviewed the following draft plans, and would like to submit the following comments and requirements:

Investigation of Soil Contamination Resulting from Tanks 53 & 56  
Tank Farm 5"

As per the 4 February 1992 meeting between RIDEM and the Navy, EPA and RIDEM are requiring that an investigation be conducted under the floor of the tanks to verify if contamination exists. This issue still has not been addressed, though it appears suitable that it be addressed under this investigation contract. Submit notification, within 10 days, of how the Navy intends to address this issue.

A review of the draft plan indicates that more detail is needed to obtain a sufficient sampling plan, sampling, and contamination identification.

Specifically, the Department suggests the following:

Task 1

Item (a) should specify the methods to be used in defining the sampling program. These methods should include, but not be limited to, surface sampling and subsurface sampling utilizing soil borings, and soil/gas survey specifying the instrumentation to be used, to groundwater. Rationalization for each method should be presented.

Item (d) should include a grid and sample locations for soil/gas surveys. Methodology and rationalization for the soil gas survey must be detailed enough and supply enough information to support the number of soil samples to be taken.

Item (f) does not allow for an adequate number of soil borings. The Department believes at least 20 soil borings around each tank, and two background soil borings should be conducted; however this number may or may not be adequate, depending upon the analytical results of the soil gas survey and soil borings conducted. Provisions should be made in the event that the extent of contamination cannot be determined with this limited number of soil borings, for additional borings to be conducted. In addition, all soil borings must extend to groundwater or bedrock.

Item (g) should require that the plan detail what method will be utilized to determine the three most highly contaminated split spoon samples from each boring. This information should be presented at the Sampling and Analysis Plan meeting

#### Task 2

This section should include the requirement for the contractors to also present the proposed soil gas survey grid and soil gas sampling points, including various depths, to groundwater.

#### Task 8

This section should include proposed cleanup levels. The proposed cleanup levels must include, at a minimum, cleanup to background levels for constituents present, 100 ppm total petroleum hydrocarbon, levels of contaminants present below the established treatment standards as specified in 40 CFR 268 for those contaminants, and any other pertinent state or federal cleanup standard. Rationale for proposed cleanup levels must also be presented.

#### Demolition of Tanks 53 and 56 at Tank Farm 5, 26 August 1991

The recently submitted Closure Plan, Tanks 53 and 56 at Tank Farm 5, February 1992 indicates that the soil remediation and tank demolition portions of the closure will be taken as two separate actions, however, these actions are both included in the current Tank Demolition contract. This must be clarified and if necessary, the tank demolition contract revised accordingly. Also, the closure plan indicates that the demolition portion of the closure will not be conducted until groundwater remediation is complete. This is in opposition to previously agreed upon closure activities, as discussed at the 4 February 1992 meeting, and is more fully responded to in the forthcoming RIDEM letter regarding the submitted Draft Tank Closure Plan.

The following comments are also being submitted:

Item 1b:

Will the amount of contaminated soil to be removed change depending upon the results of the Investigation of Soil Contamination? If not, what provisions will be made if the amount of soil contamination is determined to be greater than 700 tons?

#### Section 1.4.2.1

The term "a Rhode Island Department of Environmental Management sampling plan" appears to indicate that such a plan or set of guidelines exists, when in fact, it does not. This terminology should be reworded to indicate that a sampling plan must be submitted for RI DEM approval.

#### Section 3.3.1

This section should be revised to include data submitted in the Investigation of Soil Contamination Resulting from Tanks 53 and 56 at Tank Farm 5 Final Report; specifically, the sections of the report under Task 7: Draft and Final Report and Task 8: Preliminary Alternatives for soil remediation. In addition, the contractor should be instructed that if any areas of high contamination are found which were not previously identified, all work must cease immediately, and the contractor must contact RI DEM and NETC Public Works for further instructions.

The reference made to the Rhode Island Department of Environmental Management's Regulations for hazardous pollutants should be revised, as no such regulations exist. Sampling should be conducted in accordance with a pre-approved sampling plan as stated in section 1.4.2.1.

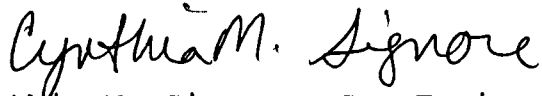
The section addressing disposal of the material should specifically indicate that all transporters transporting waste using a Uniform Hazardous Waste Manifest must be properly inspected and permitted at least two weeks prior to starting the job.

This contract should include the stipulation that all work must be conducted in compliance with the approved Tank Closure Plan and Soil Investigation Plan, if both phases are to be conducted under this contract. In addition, this contract should require that a schedule of work be submitted, indicating each phase of the demolition, excavation, back-filling, and removal of contaminated soil, and how long each phase will take.

Please submit revised Investigation of Soil Contamination Resulting from Tanks 53 & 56 Tank Farm 5" and Demolition of Tanks 53 and 56 at Tank Farm 5, 26 August 1991 plans within 30 days for approval.

Please contact me at 401-277-2797 if you have any questions.

Sincerely

A handwritten signature in cursive script that reads "Cynthia M. Signore".

Cynthia M. Signore, Sr. Environmental Scientist  
Division of Air and Hazardous Materials

cc: Capt. A.T. Pringle

netctcl1.1tr